

07-12-3  
Eric Little

Comments of Eric Little of Southern California Edison

1990 Baseline

Edison appreciates the efforts of the Staff, particularly in the power sector assessments. That being said, we still have some concerns regarding the consistency between the development of the 1990 Baseline, and the protocols to be adopted for reporting emissions going forward. The Staff used a "top-down" referred to as a fuel-input approach to estimate 1990 emissions, while the reporting requirements going forward will rely in many instances on in-stack monitoring data. This wouldn't be a concern except for the fact that on average, in-stack monitors tend to report emission levels 5% higher than the fuel-input approach. Some ability to reconcile needs to be pursued.

Of a different concern are the reductions the Staff has recently made to the CEC's original 1990 transportation sector GHG estimates. 1990 estimates for highway vehicles were reduced by 9.4 MMTCO<sub>2e</sub> or more than 6%. At the same time, estimates for trains, ships and planes were reduced nearly 21 MMTCO<sub>2e</sub> or more than two-thirds from the CEC estimate for 1990. Although we are not experts in the transportation sector, we are concerned over such a reduction since there is a high likelihood that the electric sector will be saddled with a greater share of the GHG reductions going forward.

By way of background, Edison's GHG emissions today are below 1990 levels.

As a result of these and other areas,, Edison believes that as part of adopting the 1990 Baseline, the Board needs to also recognize the need to review the baseline estimate a year from now, to insure that it has the most accurate estimate. The Staff is recommending that a review occur if there is a significant change. All we are suggesting is that rather than try to define what a significant change is, it would be worthwhile to just plan on a review of the 1990 Baseline a year from now.

Thank you

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Reporting Protocols

Mandatory Reporting protocols and their recognition of some of our concerns. However, there continue to be several concerns, including the need to recognize that exchange agreements are different than exports and that the 7.5% loss factor should not be applied to all imports from the PNW or DSW.

Furthermore, as the Staff acknowledges, there has not been a determination of the point of regulation for the electric sector. To compensate for this, the current proposal requires the reporting of emission information for the various alternative approaches. While Edison understands the need to do this until there is a determination on the point of regulation, we are recommending once such a determination is made, that the ARB Board direct the Staff to revisit its protocols, with the intent of eliminating any unnecessary reporting requirements. This adheres to AB-32's directive to "minimize the administrative burden" (H&S Code 38562(b)(7)).

Thank you.